

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

ASHLEY ADAMS, individually and as the representative of the Estate of RODNEY GERALD ADAMS, and WANDA ADAMS, individually;

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CARLETTE HUNTER JAMES, individually and as the representative of the Estate of KENNETH WAYNE JAMES, KRISTY JAMES, KRYSTAL JAMES, KENDRICK JAMES, ARLETT JAMES, JONATHAN JAMES, and KENNETH EVANS, individually and as heirs-at-law to the Estate of KENNETH WAYNE JAMES, and VIRGINIA AVERY, as a representative of the Estate of MARY LOU JAMES, individually;

Consolidated with  
*Webb v. Livingston*,  
4:14-cv-3302  
*Togonidze v. Livingston*,  
4:14-cv-3324

MARCUS "CADE" HUDSON, individually, on behalf of all wrongful death beneficiaries, and on behalf of the Estate of DOUGLAS HUDSON,

Plaintiffs,

V.

BRAD LIVINGSTON, individually and in his official capacity, JOE OLIVER, NANCY BETTS, STEVEN FIELDS, JOHN DOE, ROBERT LEONARD, BRANDON MATTHEWS, DEBRA GILMORE, SARA RAINES, DANNY WASHINGTON, MATTHEW SEDA, TULLY FLOWERS, DORIS EDWARDS, LINDA MCKNIGHT, REVOYDA DODD, RICK THALER, WILLIAM STEPHENS, ROBERT EASON, DENNIS MILLER, REGINALD GOINGS, LANNETTE LINTHICUM, JENNIFER BUSKIRK, and OWEN MURRAY in their individual capacities, TEXAS DEPARTMENT OF CRIMINAL JUSTICE, and UNIVERSITY OF TEXAS MEDICAL BRANCH.

## Defendants.

## Joint Motion to Extend Deadlines and Stay Discovery

The Parties jointly file this motion to extend all case deadlines as set forth in the scheduling order, including all pending motions and responses, and to stay all discovery for **seventy-five (75) days** from any previous deadlines, to include all deadlines from January 31, 2018 forward. The parties have reached a preliminary settlement agreement for this case and the related cases pending before the Court. The preliminary settlement is subject to multiple levels of approval, including approval

from the Attorney General, the Governor, the Comptroller, and others. The parties anticipate that the settlements will be approved following completion of the process. The parties request that deadlines be extended and discovery stayed so that they may work through the settlement process.

The Parties respectfully request all proceedings and discovery in this case be stayed and deadlines extended for seventy-five days from any previous deadline in place as of January 31, 2018. By way of example, the following matters have deadlines within the next seventy-five days, and the parties request that these deadlines, as well as all other deadlines, be extended by seventy-five days:

Pleading Deadline	Current Deadline	New Proposed Deadline
Defendants TDCJ and Goings' response to Plaintiffs' motion for sanctions	February 7, 2018	April 23, 2018
Adams reply briefing in support of summary judgment	February 7, 2018	April 23, 2018
Togonidze Discovery Deadline	February 16, 2018	May 2, 2018
Martone Expert Reports	March 14, 2018	May 28, 2018
Togonidze Dispositive Motions Deadline	March 16, 2018	May 30, 2018
Martone Rebuttal Expert Reports	March 28, 2018	June 11, 2018
Hinojosa Expert Reports	April 23, 2018	July 9, 2018

The parties also request that discovery be stayed. As settlements become final in this and the related cases, the parties will notify the Court and will file a motion to dismiss the case. Within seventy-five days, the parties will notify the Court of the status of any remaining cases in which the settlement process is not complete.

Respectfully submitted,

**KEN PAXTON**  
Attorney General of Texas

**JEFFREY C. MATEER**  
First Assistant Attorney General

**BRANTLEY STARR**  
Deputy First Assistant Attorney General

**JAMES E. DAVIS**  
Deputy Attorney General for Civil Litigation

**LACEY E. MASE**  
Assistant Attorney General  
Chief, Law Enforcement Defense Division

/s/ Leah O'Leary  
**LEAH O'LEARY**  
Assistant Attorney General  
Lead Attorney  
Texas Bar No. 24079074  
Southern District ID No. 1563191  
[Leah.OLeary@oag.texas.gov](mailto:Leah.OLeary@oag.texas.gov)

**LAW ENFORCEMENT DEFENSE DIVISION**  
P. O. Box 12548, Capitol Station  
Austin, Texas 78711  
Phone: (512) 463-2080  
Fax No.: (512) 370-9918

**ATTORNEYS FOR TDCJ AND TDCJ  
INDIVIDUAL DEFENDANTS**

/s/ Shanna Elizabeth Molinare  
**SHANNA ELIZABETH MOLINARE**  
Attorney-in-Charge  
Assistant Attorney General  
Texas Bar No. 24041506  
Southern District ID No. 38632  
[shanna.molinare@oag.texas.gov](mailto:shanna.molinare@oag.texas.gov)

Law Enforcement Defense Division  
P. O. Box 12548, Capitol Station  
Austin, Texas 78711  
Phone: (512) 463-2080, Fax: (512) 370-9814

**GRAIG J. ALVAREZ**  
State Bar No. 06934340  
Federal I.D. No. 22596  
[Graig.Alvarez@asb.legal](mailto:Graig.Alvarez@asb.legal)

**KARA STAUFFER**  
State Bar No. 24001647  
Federal I.D. No. 685342  
[Kara.Stauffer@asb.legal](mailto:Kara.Stauffer@asb.legal)

**ALVAREZ STAUFFER BREMER PLLC**  
815 Walker Street, Suite 1450  
Houston, TX 77002  
Phone: (713) 351-0300  
Fax: (713) 351-0320

**ATTORNEYS FOR UTMB AND UTMB  
INDIVIDUAL DEFENDANTS**

/s/ Jeff Edwards  
**JEFF EDWARDS**  
State Bar No. 24014406  
Lead Counsel

**SCOTT MEDLOCK**  
State Bar No. 24044783

**DAVID JAMES**  
State Bar No. 24092572

**MICHAEL SINGLEY**  
State Bar No. 00794642

**EDWARDS LAW**  
The Haehnel Building  
1101 East 11th Street  
Austin, Texas 787002  
Phone: (512) 623-7727  
Fax: (512) 623-7729  
**ATTORNEYS FOR THE PLAINTIFFS**

**NOTICE OF ELECTRONIC FILING**

I, **LEAH O'LEARY**, Assistant Attorney General of Texas, do hereby certify that I have electronically submitted for filing, a correct copy of the foregoing in accordance with the Electronic Case Files System of the Southern District of Texas, on February 6, 2018.

/s/ Leah O'Leary  
Assistant Attorney General

**CERTIFICATE OF SERVICE**

I, **LEAH O'LEARY**, Assistant Attorney General of Texas, do hereby certify that a true and correct copy of the above and foregoing has been served by electronic service on this 6th of February, 2018 addressed to all attorneys of record.

/s/ Leah O'Leary  
Assistant Attorney General